

In re Patent Application of:  
**CLARKE ET AL.**  
Serial No. 10/777,959  
Filing Date: **FEBRUARY 12, 2004**

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#### REMARKS

The Examiner is thanked for the thorough examination of the present application. In view of the arguments presented in detail below, it is submitted that all of the claims are patentable.

#### I. The Claimed Invention

The present invention is directed to a communications system. As recited in independent Claim 1, for example, the system includes a plurality of data storage devices storing data based upon at least one of a plurality of different operating protocols. The system further includes a plurality of mobile wireless communications devices each accessing the data storage devices based upon at least one of the plurality of different operating protocols. Moreover, the system also includes a protocol interface device comprising a front-end proxy module communicating with the plurality of mobile wireless communications devices based upon respective operating protocols, and a protocol engine module communicating with the front-end proxy module based upon a Web-based distributed authoring and versioning (WebDAV) common interface protocol. The protocol interface device further includes a respective interface connector module translating communications between the protocol engine module and the plurality of data storage devices for each of the different operating protocols.

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Independent Claims 10 and 15 are directed to related protocol interface devices. Furthermore, independent Claim 20 is directed to a related method, and independent Claim 25 is directed to a related computer-readable medium.

## **II. The Claims Are Patentable**

The Examiner rejected independent Claims 1, 10, 15, 20 and 25 over U.S. Patent No. 6,615,212 to Dutta et al. in view of U.S. Patent Pub. No. 2003/0231207 to Huang. Dutta et al. is directed to system for providing content from a distributed database to a client. A transcoding proxy server receives a request for content from a client machine. The transcoding proxy server retrieves the content from an originating server. The retrieved content is provided in a first format type. In response to a determination that an increase in efficiency would be obtained by allowing the client to process the content in the first format type prior to transcoding the content into a second format type, the transcoding proxy server sends the content to the client in the first format type. Furthermore, in response to a determination that the client does not have content processing software for processing the content in the first format, the transcoding proxy server sends content processing software for the first format type along with the content in the first format type to the client. The transcoding proxy server then transcodes the content from the first format type into the second format

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type and sends the content in the second format to the client.  
See, e.g., col. 2, lines 39-57 of Dutta et al.

The Examiner correctly acknowledges that Dutta et al. fails to teach or fairly suggest communication between a protocol engine module and front-end proxy module based upon a Web-based distributed authoring and versioning (WebDAV) common interface protocol, as recited in the above-noted independent claims. Nonetheless, the Examiner contends that Huang properly provides the noted deficiency. Huang is directed to a personal e-mail system that includes an ad-hoc computer host platform loaded with a personal e-mail application program. The host has Internet access and a user has previously established e-mail accounts at a variety of provider sites. The user is periodically delivered e-mail messages that are collected from such provider sites, and such are displayed according to any display limitations that exist with the particular host platform. The personal e-mail application program automatically and dynamically adjusts the protocols it uses to suit the particular provider site it is accessing, and uses user-provided user names and passwords to access the provider site to appear as if the user themselves has properly logged in. The personal e-mail application program then can send responses or issue new messages that are accepted by the provider site and issued by it as if originated from there. See, e.g., Huang paragraphs 0023-0026.

It is respectfully submitted that the Examiner mischaracterizes the teachings of Huang, and the selective

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combination of prior art thus fails to teach or fairly suggest all of the recitations of the above-noted independent claims. In support of the Examiner's contention that Huang teaches the above-noted WebDAV feature, the Examiner points to paragraph 0037 of Huang on page 3 of the above-noted Office Action. Yet, this paragraph is merely a brief description of FIG. 8 of the reference, which makes no reference to WebDAV, and Applicants therefore believe that the Examiner may have inadvertently quoted the wrong paragraph of Huang.

Huang does state the following at paragraph 0219 thereof:

"[0219] Hotmail e-mail system access is based on a unique login process and a protocol, e.g., so-called "WebDAV". This document describes the Hotmail Login process, and the Hotmail implementation of the WebDAV protocol. More information about the WebDAV protocol is available at the WebDAV web site ([www.webdav.org](http://www.webdav.org))."

What Huang does teach in paragraph 0219 and following is the use of WebDAV-based communications between the personal email service **104** (see FIG. 1) and an external email account provider, namely a Hotmail server **112**. Nowhere does this reference teach or fairly suggest that WebDAV is used for communication between device and server interface components within the personal email service **104** itself, i.e., between the components that communicate with the portable wireless device **102**

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(such as the claimed front-end proxy module) and the email service provider **112** (such as the claimed protocol engine module).

Accordingly, since Huang only contemplates the use of WebDAV for communications between the personal email service **104** and external email account providers, the proposed combination of references fails to teach or fairly suggest all of the recitations of the above-noted independent claims. It is therefore submitted that independent Claims 1, 10, 15, 20 and 25 are patentable over the prior art. Their respective dependent claims, which recite yet further distinguishing features, are also patentable over the prior art and require no further discussion herein.

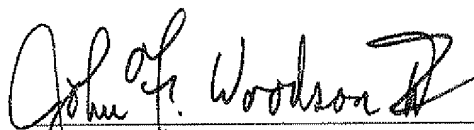
#### **CONCLUSION**

In view of the arguments provided herein, it is submitted that all the claims are patentable. Accordingly, a Notice of Allowance is requested in due course. Should any minor informalities need to be addressed, the Examiner is encouraged to contact the undersigned attorney at the telephone number listed below.

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Respectfully submitted,

A handwritten signature in dark ink, appearing to read "John F. Woodson, II". The signature is fluid and cursive, with a large, stylized "J" and "W".

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